

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ARTHUR J. GALLAGHER & CO., )  
Plaintiff, ) Case No.: 1:22-cv-03931  
v. )  
ALLIANT INSURANCE SERVICES, INC., )  
Defendant. ) **DEMAND FOR JURY TRIAL**

**PLAINTIFF'S EMERGENCY MOTION FOR TEMPORARY  
RESTRANDING ORDER AND PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Arthur J. Gallagher & Co. (“Gallagher”) hereby moves this Court for a temporary restraining order and preliminary injunction against Defendant Alliant Insurance Services, Inc. (“Alliant”).

For the reasons set forth below and in Gallagher’s accompanying Memorandum of Law in Support of Plaintiff’s Emergency Motion for Temporary Restraining Order and Preliminary Injunction (“Memorandum of Law”) and the Declaration of Jeffrey Devron (Exhibit A thereto), Gallagher seeks an order temporarily and preliminarily restraining and enjoining Alliant from (1) soliciting any Gallagher client serviced by Kristen Long, Jordan Laeyendecker, Taylor Gunnells, Janet Schumacher, Melissa Haggerty, Rosario Zaragoza, Sara Arnold, and Kelly Hogan (collectively the “Resigning Employees”) during the two years preceding the Resigning Employees’ resignations; (2) allowing the Resigning Employees to engage in activities for Alliant’s benefit (rather than Gallagher’s benefit) for 21 days following entry of an order granting a temporary restraining order and/or preliminary injunction; and (3) using, possessing, or disclosing any of Gallagher’s trade secrets and other confidential information (“Confidential Information”). Moreover, Gallagher seeks an order directing Alliant to immediately return any

Gallagher Confidential Information in the possession, custody, or control of Alliant or its employees.

In support of this Motion, Gallagher states as follows:

1. Gallagher seeks to restrain and enjoin Alliant from wrongfully stealing Gallagher's business. Over the last several years, Alliant has engaged in a scheme to unlawfully harm its competitors, including Gallagher, and accordingly, Gallagher brings this motion for emergency injunctive relief to prevent further irreparable harm from Alliant's violations of Illinois common law through tortious interference with contract and prospective economic advantage, aiding and abetting breach of fiduciary duty, and conspiracy, as well as its use, possession, and disclosure of Gallagher's Confidential Information.

2. Gallagher is entitled to a temporary restraining order and a preliminary injunction because it has suffered and will suffer irreparable harm if Alliant is not enjoined; because it has no adequate remedy at law; and because it has a strong likelihood of succeeding on the merits of its claims. Furthermore, the balance of harms and the public interest strongly support the issuance of temporary and preliminary relief in this case.

3. Gallagher respectfully requests an immediate hearing on the temporary restraining order and a timely hearing on the preliminary injunction.

4. The legal arguments and authorities supporting this Motion are set forth in Gallagher's accompanying Memorandum of Law. The factual basis supporting this Motion is set forth in the Declaration of Jeffrey Devron and the Complaint.

WHEREFORE, Gallagher respectfully requests that this Court grant its Motion, including the following specific relief:

- a. An order temporarily and preliminarily restraining and enjoining Defendant Alliant from soliciting any Gallagher client serviced by the Resigning Employees during the two years preceding the Resigning Employees' resignations;
- b. An order temporarily restraining and preliminarily enjoining Defendant Alliant from allowing the Resigning Employees to engage in activities for Alliant's benefit (rather than Gallagher's benefit) for 21 days following entry of an order granting a temporary restraining order and/or preliminary injunction;
- c. An order temporarily restraining and preliminarily enjoining Defendant Alliant from using, possessing, or disclosing any of Gallagher's Confidential Information;
- d. An order directing Alliant to immediately return any Gallagher Confidential Information in the possession, custody, or control of Alliant or its employees;
- e. An order awarding Gallagher its attorneys' fees and costs; and
- f. Such other and further relief as this Court deems just and proper.

DATED: July 28, 2022

Respectfully submitted,

/s/ Ronald S. Safer  
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